

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA, :  
: :  
: : STIPULATION AND ORDER  
: : OF SETTLEMENT  
- v. - : 13 Cr. 560 (PGG)  
: :  
: :  
INGRID LEDERHAAS-OKUN, :  
a/k/a "INGRID OKUN," :  
: :  
Defendant. :  
: :  
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WHEREAS on or about July 26, 2013, INGRID LEDERHAAS-OKUN, a/k/a "Ingrid Okun," (the defendant) pled guilty to a one-count Information (the "Information") pursuant to a plea agreement with the Government (the "Plea Agreement");

WHEREAS on or about July 29, 2013, the Court entered a Consent Preliminary Order of Forfeiture/Money Judgment (the "Consent Order") including a Money Judgment against the defendant in the amount of \$2,114,873 (the "Money Judgment"), and the forfeiture of all right, title and interest of the defendant in various items seized from her residence at the time of her arrest on July 2, 2013 (the "Specific Property");

WHEREAS on or about October 28, 2013, Robert Okun ("Okun") filed a Third Party Petition (the "Petition") claiming ownership of certain items from the Specific Property, specifically the following item numbers contained on the Government's inventory of the Specific Property, attached to the

Petition as Exhibit D: 6, 38, 102, 106, 115, 143, 209-217, 224, 225, 233-235, 253, 267-301, 303-309 (collectively, the "Claimed Property");

WHEREAS, pursuant to Title 21, United States Code, Section 853(p), the Government is entitled to forfeit other property of the defendant up to the amount of the Money Judgment;

WHEREAS, the defendant and Okun, were the owners of the real property located at 1 Timber Lane, Darien, CT 06820 (the "House");

WHEREAS, on or about December 21, 2013, the Court entered a Stipulation and Order in which Okun agreed to maintain the net proceeds of any sale of the House in an escrow account maintained by Okun's counsel, Bernard Kleinman, Esq., pending a determination of the respective interests of the Government and Okun in the House;

WHEREAS, on or about December 23, 2013, the Court entered a Stipulation and Order in which the defendant agreed to pay her share of the net proceeds of any sale of the House to the Government in partial satisfaction of the Money Judgment;

WHEREAS, the House was subsequently sold, and net proceeds of \$1,613,607.82, including interest (the "Sale Proceeds"), are currently being held in escrow;

WHEREAS, the Government and Okun agree that the defendant and Okun each have a 50% interest in the Sale Proceeds;

WHEREAS, at the time of the defendant's arrest, the defendant and Okun jointly held two accounts at Charles Schwab containing a total of \$72,123.83 (the "Schwab Funds");

WHEREAS, the Government and Okun have agreed to settle the claims set forth in the Petition and their respective interests in the Sale Proceeds and the Schwab Funds on the terms set forth in this Stipulation and Order of Settlement;

IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, by its attorney Preet Bharara, United States Attorney, Assistant United States Attorneys Rosemary Nidiry and Alexander J. Wilson, of counsel, and Petitioner Robert A. Okun, and his counsel, Bernard Kleinman, Esq., that:

1. Within seven (7) days of entry of this Stipulation and Order of Settlement, Petitioner Robert Okun ("Okun") shall make a payment (the "Payment") to the United States in the amount of \$842,865.83, representing the defendant's entire interest in the Sale Proceeds and half of the Schwab Funds, by sending a check payable to the United States Marshals Service to the following address:

United States Attorney's Office  
c/o Karyn Leon  
One Saint Andrews Plaza

Asset Forfeiture Unit - 1st Floor  
New York, NY 10007.

2. The Government shall credit the Payment towards the defendant's Money Judgment, and shall dispose of it according to law.

3. The Government shall take no further action to forfeit the remainder of the Sale Proceeds and Schwab Funds as substitute assets of the defendant, or based on the defendant's conduct as charged in the Information or the underlying Complaint in this case.

4. Okun hereby withdraws his claim as to items 6, 38, 102, 143, 233, 234, and 235 of the Claimed Property (the "Forfeited Property"), and consents to the forfeiture of those items to the Government.

5. Upon receipt of the Payment, the Government shall transfer the remainder of the Claimed Property (the "Transferred Property") by making the Transferred Property available for collection by Okun or his counsel. The Government shall assert no further claim or interest in the Transferred Property based on the Consent Order.

6. Okun is hereby barred from asserting, or assisting others in asserting, any claim against the United States of America ("USA"), the Federal Bureau of Investigation ("FBI"), the Department of Justice ("DOJ"), the U.S. Attorney's

Office for the Southern District of New York ("USAO-SDNY"), or any agents and employees of the USA, the FBI, the DOJ, or the USAO-SDNY, in connection with or arising out of the seizure, restraint, and/or constructive possession of the Specific Property, including, but not limited to, any claim that there was no probable cause to seize and/or forfeit the Specific Property, that Okun is a prevailing party, or that Okun is entitled to attorney's fees or any award of interest.

7. Okun represent that he is the only owner of the Transferred Property, and agree to hold harmless the USA, the FBI, the DOJ and the USAO-SDNY, as well as any and all employees, officers, and agents of the USA, the FBI, the DOJ and the USAO-SDNY, from any and all claims in connection with or arising out of the seizure, restraint, and/or constructive possession of the Transferred Property including but not limited to any third-party claims of ownership of the Transferred Property.

8. Okun hereby agrees to waive all rights to appeal or otherwise challenge or contest the validity of this Stipulation and Order.

9. The Court shall have exclusive jurisdiction over the interpretation and enforcement of this Stipulation and Order.

10. Each party to this Stipulation and Order shall

bear its own legal and other costs incurred in connection with this matter.

11. The signature pages of this Stipulation and Order may be executed in one or more counterparts, each of which will be deemed an original but all of which together will constitute

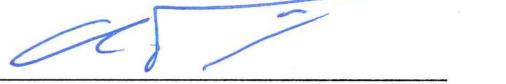
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one and the same instrument. Signature pages may be by fax or email and such signatures shall be deemed as valid originals.

Dated: New York, New York  
April \_\_, 2015

AGREED AND CONSENTED TO:

PREET BHARARA  
United States Attorney for the  
Southern District of New York  
Attorney for the United States

By:   
ALEXANDER J. WILSON  
Assistant United States Attorney  
One St. Andrew's Plaza  
New York, New York 10007  
(212) 637-2453

April 10, 2015  
DATE

ROBERT A. OKUN

By: \_\_\_\_\_  
ROBERT A. OKUN

\_\_\_\_\_  
DATE

By: \_\_\_\_\_  
BERNARD KLEINMAN, ESQ.

\_\_\_\_\_  
DATE

So Ordered:

HONORABLE PAUL G. GARDEPHE  
UNITED STATES DISTRICT JUDGE  
SOUTHERN DISTRICT OF NEW YORK

one and the same instrument. Signature pages may be by fax or email and such signatures shall be deemed as valid originals.

Dated: New York, New York  
April \_\_, 2015

AGREED AND CONSENTED TO:

PREET BHARARA  
United States Attorney for the  
Southern District of New York  
Attorney for the United States

By: ALEXANDER J. WILSON  
Assistant United States Attorney  
One St. Andrew's Plaza  
New York, New York 10007  
(212) 637-2453

DATE

ROBERT A. OKUN

By: ROBERT A. OKUN

DATE

By: BERNARD KLEINMAN, ESQ.

04/08/2015  
DATE

So Ordered:

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HONORABLE PAUL G. GARDEPHE  
UNITED STATES DISTRICT JUDGE  
SOUTHERN DISTRICT OF NEW YORK